



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 25, 2017

By Email

Lee Ginsburg, Esq.
James Roth, Esq.
Freeman, Nooter & Ginsberg
75 Maiden Lane Suite 503
New York, NY 10038

Re: *United States v. Scott Tucker, et al.*

Dear Counsel:

This letter responds to your letter of May 18, 2017. Although I do not necessarily agree with the entire factual recitation in letter, I will respond here to the questions you posed therein.

First, the Government has not prepared any index or any other document summarizing the native files, or any portion thereof. I do not expect at this point that the Government will be preparing any such document, but if we do, we will share it with the defendants.


Second, regarding documents the Government may use at trial, to date, the Government has not identified any documents contained in the new production that are of particular interest. In previous correspondence with you, the Government identified recordings of interest. They include recordings that can be found at AMG-SDNY-03028385-88 and AMG-SDNY-03479898, which were produced on CD in January, and MNE-SDNY-00139663-72, which were produced as part of one of the initial productions. As I previously mentioned, if the Government identifies additional native files of interest that were only recently produced, we will identify them for you as soon as possible.

Lee Ginsburg, Esq.
James Roth, Esq.
May 25, 2017
Page 2 of 2

Please let me know if you would like to discuss these issues further.

Very truly yours,

JOON H. KIM
Acting United States Attorney

By: 

Niketh Velamoor
Assistant United States Attorney
(212) 637-1076

cc: Tom Bath, Esq. (by Email)
Marc Agnifilo, Esq. (by Email)